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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 DEBBIE SIEGFRIED, individually,  
11 Plaintiff,

12 vs.

13 LOYA INSURANCE COMPANY, a  
14 Foreign Corporation; and JESS LOPEZ,  
15 individually; DOES I through X; and ROE  
16 BUSINESS ENTITIES I through X,  
inclusive,

17 Defendants.  
18  
19

CASE NO.: 2:20-cv-01905-KJD-DJA

**JOINT MOTION TO EXTEND THE  
DEADLINE FOR DEFENDANT  
LOYA INSURANCE COMPANY TO  
FILE ITS REPLY IN SUPPORT OF  
MOTION FOR PROTECTIVE  
ORDER REGARDING PLAINTIFF  
DEBBIE SIEGFRIED'S  
DEPOSITION SUBPOENA TO THE  
F.R.C.P. 30(b)(6)  
REPRESENTATIVE FOR LOYA  
INSURANCE COMPANY (ECF No.  
51)  
(First Request)**

20 Plaintiff DEBBIE SIEGFRIED ("Siegfried"), by and through her counsel of record,  
21 Dennis M. Prince and Kevin T. Strong of PRINCE LAW GROUP, and Defendant LOYA  
22 INSURANCE COMPANY ("Loya"), by and through its counsel of record, M. Bradley  
23 Johnson of KRAVITZ SCHNITZER JOHNSON & WATSON, CHTD., hereby file their  
24 *Joint Motion to Extend the Deadline for Defendant Loya Insurance Company to File its*  
25 *Reply in Support of Motion for Protective Order Regarding Plaintiff Debbie Siegfried's*  
26 *Deposition Subpoena to the F.R.C.P. 30(b)(6) Representative for Loya Insurance*  
27 *Company (First Request).*

28 . . .



# MEMORANDUM OF POINTS AND AUTHORITIES

## I.

### LEGAL ARGUMENT

“[D]istrict courts . . . retain broad discretion to control their dockets . . . .” *Shahrokhi v. Harter*, No. 2:21-cv-01126-RFB-NJK, 2021 U.S. Dist. LEXIS 247936, at \*4 (D. Nev. Dec. 30, 2021). Siegfried and Loya hereby respectfully move this Court to extend the deadline for Loya to file its Reply in Support of its Motion for Protective Order (ECF No. 51) by fourteen (14) days, from November 15, 2022 to November 29, 2022. Loya filed its Motion for Protective Order on October 25, 2022. Siegfried filed her Response on November 8, 2022 (ECF No. 53). Siegfried and Loya hereby submit this Joint Motion in accordance with LR IA 6-1. This is the parties’ first joint motion for extension of time for Loya to file its Reply in Support of its Motion for Protective Order.

Siegfried and Loya respectfully request an extension of the reply deadline.<sup>1</sup> Siegfried and Loya were scheduled to participate in a second mediation of this matter on November 16, 2022 in an effort to resolve this matter. However, on November 15, 2022, the parties learned that Loya’s representative is unable to attend the scheduled mediation due to the death of one of his colleagues. As the parties attempt to reschedule their mediation for a separate date, Siegfried and Loya have mutually agreed to allow Loya additional time to complete its Reply because Loya devoted substantial time and resources to prepare for the second mediation. The proposed extension of time will allow Loya the requisite time to fully address the arguments Siegfried made in her Response.

## II.

### CONCLUSION

Based on the foregoing, Plaintiff Debbie Siegfried and Defendant Loya Insurance Company respectfully request this Court to **GRANT** their Joint Motion to Extend the Deadline for Defendant Loya Insurance Company to File its Reply in Support of Motion

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<sup>1</sup> Siegfried and Loya hereby file this joint motion in lieu of a stipulation because Defendant Jess Lopez is a Defendant in this action who has not filed an answer or otherwise made an appearance. *See* LR 7-1(c) (“A stipulation that has been signed by fewer than all the parties or their attorneys will be treated—and must be filed—as a joint motion”).

1 for Protective Order Regarding Plaintiff Debbie Siegfried's Deposition Subpoena to the  
2 F.R.C.P. 30(b)(6) Representative for Loya Insurance Company (First Request).

3 DATED this 15th day of November, 2022. DATED this 15th day of November, 2022.

4 **PRINCE LAW GROUP**

**KRAVITZ, SCHNITZER JOHNSON &  
WATSON, CHTD.**

7 /s/ Kevin T. Strong

/s/ M. Bradley Johnson

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Attorneys for Defendant  
*Loya Insurance Company*

15 **IT IS SO ORDERED.**

16 DATED: November 16, 2022

17 

18 DANIEL J. ALBREGTS  
19 UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

Pursuant to LR 5-1 and FRCP 5(b), I hereby certify that I am an employee of **PRINCE LAW GROUP** and that on the 15th day of November, 2022, I electronically filed the foregoing document entitled **JOINT MOTION TO EXTEND THE DEADLINE FOR DEFENDANT LOYA INSURANCE COMPANY TO FILE ITS REPLY IN SUPPORT OF MOTION FOR PROTECTIVE ORDER REGARDING PLAINTIFF DEBBIE SIEGFRIED'S DEPOSITION SUBPOENA TO THE F.R.C.P. 30(b)(6) REPRESENTATIVE FOR LOYA INSURANCE COMPANY (ECF No. 51) (First Request)** with the Clerk of the Court using the CM/ECF system, which sent a notice of electronic filing to the following:

M. Bradley Johnson  
Kristopher T. Zeppenfeld  
**KRAVITZ, SCHNITZER & JOHNSON**  
8985 S. Eastern Avenue, Suite 200  
Las Vegas, Nevada 89123  
Tel: (702) 322-4126  
Fax: (702) 362-2203  
Attorneys for Defendant  
*Loya Insurance Company*

Pursuant to LR 5-1 and FRCP 5(b), I hereby certify that I also served the foregoing documents via First-Class United States Mail to the following address:

Jess Lopez  
8744 Raindrop Canyon  
Las Vegas, Nevada 89129

/s/ Kevin T. Strong  
An Employee of Prince Law Group